

July 31, 2017

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Telephone Number Portability, et al.
CC Docket No. 95-116; WC Docket Nos. 09-109 and 07-149

Dear Secretary Dortch:

The North American Portability Management LLC (the "NAPM LLC"), by its attorneys, hereby files a written summary of the NAPM LLC's status updates to the Federal Communications Commission ("FCC" or "Commission") regarding the transition from the current local number portability administrator ("LNPA"), Neustar, to the new LNPA, Telcordia d/b/a iconectiv (the "Report").¹ This Report updates the FCC, the public, and all interested stakeholders regarding transition activities to date in accordance with the requirements of the LNPA Selection Order² and guidance received from the FCC on June 24, 2015.³ The NAPM LLC will continue to file written updates of this Report with the FCC at the end of each month until transition is complete.

Transition Oversight Plan

The Transition Oversight Plan ("TOP"), dated August 31, 2015 was edited and refiled December 5, 2016, and the TOP is published on the public portion of the NAPM LLC's website at www.NAPMLLC.org.⁴ Although one or more transition milestone dates may be adjusted as appropriate to mitigate risk, the previously published dates remain accurate, and the transition is currently on track to meet the Final Acceptance Date of May 25, 2018.

¹ This Report is intended to provide an update with respect to events that occurred during the prior month. Although the monthly Reports may, at times, reflect certain developments that occurred between the end of the month for which the Report is filed and the date upon which the draft Report received final approval by the NAPM LLC for filing with the Commission, the Reports generally do not reflect all developments that occur during the month in which the Report is filed, which will be reflected in the Report for the following month. Please review previous Reports for information about previous developments.

² *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration et al.*, Order, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116, ¶¶ 158-59 (rel. Mar. 27, 2015) (*LNPA Selection Order*).

³ This summary reflects information relevant to the transition as managed by the NAPM LLC with the assistance of the TOM and the oversight of the Commission.

⁴ See https://www.napmlc.org/Docs/npac/ref_docs/08%2031%2015%20-%20Updated%20Transition%20Oversight%20Plan.pdf.

Stakeholder Outreach and Education

Since the last Report, the Transition Oversight Manager (the "TOM") presented transition updates at the following events:

- The LNPA Working Group call on June 7, 2017;
- The TOEP webcast on June 14, 2017, which was attended by 186 participants; and
- The quarterly NANC meeting on June 29, 2017 in Washington, DC.

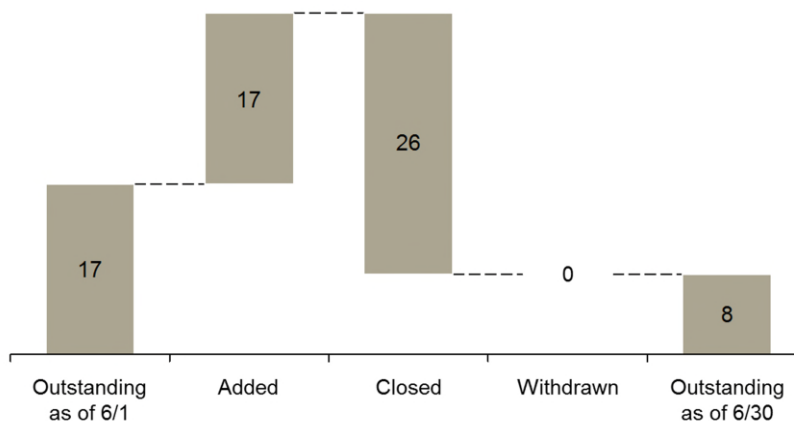
TOM Transition Activities

The TOM continued to advance the objectives of the LNPA transition program in June. The accomplishments in June include:

- Successfully completed phase 1 of LNPA-to-LNPA data migration testing;
- Monitored ongoing vendor testing and facilitated reviews of test results and exceptions;
- Confirmed that 9 systems under test have initiated vendor testing as of June 30, 2017;
- Confirmed agreement on the transition of the NPAC Change Management function from Neustar to iconectiv on August 1, 2017;
- Confirmed the June delivery of production NPAC customer data from Neustar to iconectiv;
- Confirmed delivery of iconectiv's Low Tech Interface (LTI) GUI Training to NPAC users on June 14, 2017;
- Confirmed that 4 Industry Methods and Procedures (M&P) documents are under review and 41 have completed review; and
- Attended the June LNPA Working Group call on June 7, 2017.

The TOM conducts weekly meetings with the NAPM LLC Transition Team, iconectiv and Neustar to coordinate activities and communication across the parties and address ad hoc issues as they arise. These working meetings are used to identify, discuss and close tasks (A.K.A. action items) required to advance the project objectives. The graph below depicts the progress achieved in addressing these action items since the last monthly report.

Transition Action Item Progress (6/1/17 through 6/30/17)



The TOM continues to track identified LNPA transition risks including the summary program risks below:

- Lack of agreement on key transition requirements has prevented certain transition plans from being finalized, examples include:
 - An approach and implementation commitment for LNPA transition contingency rollback;
 - Determination of appropriate contractual obligations governing contingency rollback and parallel operations;
 - Governance of transition decision-making and resolution of potential disputes;
- The re-plan for Release B software retains key transition dates, but there is little remaining buffer against additional delays and/or unplanned development activities arising from FRS variances like XML SPID delegation, post-July PAS API updates, or other issues surfaced in industry testing; and
- Discovery of undocumented NPAC functionality in the incumbent vendor's (Neustar) NPAC that is not accounted for in the NPAC Functional Requirements Specifications (FRS). As an example, SPID delegation functionality was discovered during iconectiv's software quality control process. It has also been discovered that the current NPAC allows some vendor local systems to not be in compliance with the requirements as written and therefore the FRS doesn't accurately reflect the current operation of NPAC. These issues are being treated as new risks given the importance of having accurately documented specifications that can be relied upon develop NPAC software.

iconectiv

On July 25, 2016, the FCC released a final decision approving the recommendation of the NANC that iconectiv serve as the next LNPA and the terms and conditions of the draft Master Services Agreement ("MSA") that the NAPM LLC and iconectiv had previously submitted to the FCC.⁵ On August 8, 2016, the NAPM LLC and iconectiv executed the MSA. On September 21, 2016, iconectiv held the first of several planned LNPA Transition onboarding webcasts for Service Providers, Service Bureaus and Providers of Telecom Related Services. In addition, iconectiv is moving forward with meeting the requirements and deadlines set forth in the Master Services Agreement.

iconectiv continued to on-board users to its new NPAC platform. Current on-boarding status as of June 30, 2017 shows:

- ~65% of SP/SB/PTRS users have started the on-boarding process;
- 983 NPAC users have completed registration;
- 12 of 13 Service Bureaus have started on-boarding;
- All LSMS and SOA vendors have executed the Confidentiality & Testing agreements;
- 17 WDNC entities have started registration and 13 WDNC entities have completed registration; and
- 8% of ELEP entities have started registration and 7% have completed registration.

For information from iconectiv about the NPAC transition, please send an email to **LNPA-ACCT-MGMT@iconectiv.numberportability.com**

⁵ See *Telcordia Technologies, Inc. Petition to Reform Amendment 57 and to Order a Competitive Bidding Process for Number Portability Administration et al.*, Order, WC Docket Nos. 07-149, 09-109, CC Docket No. 95-116 (rel. July 27, 2015) (LNPA Approval Order).

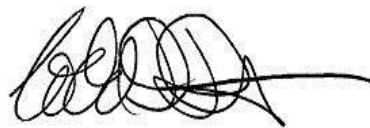
Neustar

Neustar began billing industry service providers on their December 2015 monthly Statement of Work ("SOW") invoices for transition service support billable since July 2015, consistent with the terms of SOW 97. In addition, the four-way non-disclosure agreement, which facilitates joint vendor meetings to discuss transition related issues, was signed by Neustar, the NAPM, the TOM, and iconectiv on February 2, 2017. Lastly, Neustar has executed the appropriate User Agreement with iconectiv, and is taking steps to complete the vendor on-boarding process.

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Please contact the undersigned if you have any questions or would like any additional information about the issues discussed herein.

Sincerely,



Counsel to the NAPM LLC